



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

August 7, 2012

Mark Durno
Chief, Response Section 1
Emergency Response Branch 1
U.S. EPA Region V
25089 Center Ridge Road
Westlake, Ohio 44145-4170

**RE: Plastech Engineered Products, Inc. – Andover Facility
205 Maple St. Ext., Andover, Ohio, Ashtabula County, OHD068896778
Time Critical Removal Action Request**

Dear Mr. Durno:

Ohio EPA requests U.S. EPA's assistance in evaluating the former Plastech Engineered Products, Inc. – Andover Facility for a time critical removal action. The facility and associated property is located at 205 Maple Street Extension in Andover, Ohio and is approximately 20 acres in size. During a June 2012 inspection at the facility, Ohio EPA documented regulated substances consisting of paints and solvents, containers labeled as Corrosive and Oxidizer and leaking, oil-filled electrical transformers. The facility has unrestricted access and is susceptible to vandalism which may lead to further releases of regulated substances. Included for your reference is Ohio EPA's Time Critical Removal Referral Package which includes information concerning the facility.

Site History:

On February 1, 2008, Plastech Engineered Products, Inc. (Plastech) filed for Chapter 11 bankruptcy in the U.S. Bankruptcy Court, Eastern Division of Michigan, petition number 08-42417-pjs. Subsequently, on December 31, 2008, the Bankruptcy Court authorized an order for dissolution of Plastech and its subsidiaries.

In February 2009, Ohio EPA, Division of Materials and Waste Management (DMWM), attempted to work with Trusted Partner LLC, an entity who purchased the assets of the Plastech Andover facility, to remove regulated substances. In February 2010, Trusted Partners removed a limited amount of regulated substances. Additionally, on June 15, 2009, Ohio EPA issued a Notice of Violation (NOV) letter to Plastech and James Carroll of Carroll Services LLC, chief liquidating officer for the Plastech bankruptcy, for violations of Ohio's Cessation of Regulated Operations (CRO). No response was received concerning this NOV letter.

Ohio EPA continued to monitor this facility with the intention of working with any prospective buyer of the property to address the outstanding CRO issues.

On June 13, 2012, Ohio EPA conducted an inspection of the facility which revealed regulated substances consisting of paints and solvents, containers labeled as Corrosive and Oxidizer and leaking, oil-filled electrical transformers. In addition, the site was unsecure and accessible to the public. Evidence of vandalism was observed.

Chemical Characterization of Regulated Substances:

No assessment activities have been completed on the regulated substances identified during the June 13, 2012, inspection due to property access related issues. However, it is strongly suspected that the paint and solvent found at the facility is a hazardous waste due to its ignitability. In addition, labeling on 5-gallon and 55-gallon containers indicated Corrosive and Oxidizer. Four electrical transformers were found on-site with a total estimated volume of 1,200-gallons of oil. Labeling on the transformers indicate polychlorinated biphenyls (PCBs) content is less than 50 parts per million (PPM).

Conclusion:

Uncontrolled releases of regulated substances at the facility may pose a threat to human health and the environment. A threat of fire may exist due to the suspected presence of ignitable hazardous waste at the facility.

I hereby request that U.S. EPA conduct an assessment to determine the applicability of a time critical removal action at the former Plastech Andover Facility. Ohio EPA requests that it be notified of any activities conducted at the facility. If you have any questions or require additional information, please contact Frank Zingales of Ohio EPA's Northeast District Office at (330) 963-1108.

Sincerely,

A handwritten signature in cursive script that reads "Bruce McCoy".

Bruce McCoy
Compliance Assurance Section
Division of Materials and Waste Management

BM/KS:jm

ec: Frank Zingales, DMWM, NEDO
Mitch Mathews, DMWM, CO
Kevin Clouse, DERR, CO